

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	:	
	:	
WCD, LLC	:	Case No. 17-36817
	:	Chapter 11
DEBTOR	:	

**DEBTOR'S AMENDED MOTION TO CONVERT CHAPTER 11 CASE
TO A CASE UNDER CHAPTER 7 OF THE BANKRUPTCY CODE**

TO THE HONORABLE U. S. BANKRUPTCY JUDGE:

WCD, LLC ("Debtor" or "Movant") files this Amended Motion To Convert Chapter 11 Case to a Case under Chapter 7 of the Bankruptcy Code (the "Motion"), and in support states the following:

1. This Court has jurisdiction over this Motion under 28 U.S.C. Section 157 and 1334. Venue of this proceeding and this Motion in this District is proper under 28 U.S.C. Sections 1408 and 1409.

2. On December 21, 2017, Debtor filed a petition herein under Chapter 11 of the Bankruptcy Code. Movant is the Debtor and debtor-in-possession herein. Debtor has remained in possession of its assets and has continued to operate as an engineering and staffing company. Debtor employs 8 employee/contractors who are paid on a bi-weekly basis.

3. On February 21, 2018, Debtor filed an adversary (Adv. No. 18-03031) against Materials Lifecycle Management Company of St. Louis, LLC ("MLMC"), a former major customer of Debtor.

4. Debtor and MLMC have also been in discussions regarding a possible settlement of the adversary. Debtor received a written settlement offer to the Debtor by MLMC for \$92,561.00, an amount that would essentially satisfy the secured creditor that factored the invoices to MLMC but would leave nothing for the estate.

5. Debtor has limited physical assets, primarily office furniture and computer equipment. It was anticipated that Debtor could sell its customer lists and other intangibles at auction. However, it appears that the transfer of customers to a potential buyer would be at the customers' option over which Debtor has no control.

6. Debtor stabilized its cash flow and is operating with a positive cash flow for monthly operating expenses. It currently has approximately \$30,000.00 in its DIP account as of this date. Continuing in chapter 11 in its vision of a confirmable plan would incur additional administrative costs. The prospect of increasing the dividends to the creditors is doubtful.

7. Debtor believes it is in the best interest of the estate to proceed as a debtor under Chapter 7.

WHEREFORE, Debtor prays for relief under Chapter 7 of the Bankruptcy Code.

Respectfully Submitted,

/s/ Larry A. Vick
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2018 I forwarded a true and correct copy of the above and foregoing Motion by U. S. Mail and/or the Court ECF System upon the Debtor and all creditors and parties in interest as follows:

WCD, LLC, Debtor
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Benefits Plans Plus, LLC
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Hansen Manufacturing, Inc.
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/s/ Larry A. Vick

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